

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

DOC NO  
REC'D/FILED

2013 JUL 29 PM 4:26

UNITED STATES OF AMERICA

PETER OPPENEER  
CLERK US DIST COURT  
INFORMATION OF WI

v.

Case No. 13-cr-97-bbc  
18 U.S.C. § 513(a)

BRENDA L. WERFAL,

Defendant.

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

1. At times material to this information:

(a) Southern Wisconsin Emergency Associates, S.C. (SWEA) was a Wisconsin corporation incorporated in 1989. SWEA employed emergency room doctors and physician assistants at various hospitals in Wisconsin.

(b) Specialty Billing Services, Inc. (SBS) was a Wisconsin corporation incorporated in 1993. Third-party insurance companies made payments to SBS for services rendered by employees of SWEA for their work at Wisconsin area emergency rooms and other associated costs incurred from work accomplished by SWEA employees. SBS then processed payroll for SWEA employees from funds received by SWEA from third-party insurance companies.

(c) In 1988, Defendant BRENDA L. WERFAL (WERFAL), was initially hired by SWEA, but, in 1993, she was permanently hired by SBS as its office manager. As the office manager, WERFAL was responsible for receiving payments for services

rendered by employees of SWEA, paying debts associated with SWEA's employees, and handling payroll for SWEA by making payments to SWEA employees from monies received by SBS.

2. On or about May 10, 2010, in the Western District of Wisconsin, the defendant,

BRENDA L. WERFAL,

knowingly made, uttered, and possessed a forged security of an organization with the intent to deceive such organization and other persons and organizations. Specifically, the defendant obtained a SWEA check and falsely completed the check by making it payable to Dean Health for approximately \$1,200.00 to pay her personal medical expenses.

3. On or about December 1, 2010, in the Western District of Wisconsin, the defendant,

BRENDA L. WERFAL,

knowingly made, uttered, and possessed a forged security of an organization with the intent to deceive such organization and other persons and organizations. Specifically, the defendant obtained a SWEA check and falsely completed the check by making it payable to the Milton Family Dentistry for approximately \$625.00 to pay her personal medical expenses.

4. On or about March 14, 2011, in the Western District of Wisconsin, the defendant,

BRENDA L. WERFAL,

knowingly made, uttered, and possessed a forged security of an organization with the intent to deceive such organization and other persons and organizations. Specifically, the defendant obtained a SWEA check and falsely completed the check by making it payable to the United States Internal Revenue Service for approximately \$11,995.00 to pay her personal tax liability.

(All in violation of Title 18, United States Code, Section 513(a)).

7/16/2013  
Date

John W. Vaudreuil  
JOHN W. VAUDREUIL  
United States Attorney